

**Title:**

Mr

**Forename:**

Michael

**Surname:**

Ruttenberg

**Representing:**

Self

**Organisation (if applicable):**

**Email:**

**What additional details do you want to keep confidential?:**

No

**If you want part of your response kept confidential, which parts?:**

**Ofcom may publish a response summary:**

Yes

**I confirm that I have read the declaration:**

Yes

**Additional comments:**

**Question 1:Do you agree with the proposal to include, as a matter of course, the 470 kHz and 5 MHz bands into the Licence for all Amateur Radio (Full) licensees?:**

Yes.

**Question 2:Do you agree that expressly linking a Full (Club) Licensee's authorisation to use the spectrum to his or her representation of a named club, and by adding a further ground for revoking the Licence to include**

**circumstances where the licensee no longer represents the club, will help ensure that a club's call sign remains with the club?:**

No, the club licence should continue to be valid whether the licensee remains a member or not. It is up to the club to get the paperwork and transfer the licence to a new licensee on behalf of the club. The proposal forces the club off the air, and so is a bad proposal.

As a licensee of a club callsign, the current situation is that a club callsign CAN be transferred from one licensee to another, despite what the regulations may or may not say. In practice it is happening already and has been for some years (at least 10, to my knowledge), when G4STV was transferred to another licensee. aware of).

**Question 3: Do you agree that Ofcom should include a further ground of revocation in the Licence as proposed above in order better to align Clause 4 with the definition of 'Disqualified Person'?:**

With reservations: If you are going to tighten the definition, this should cover the person under all operations regardless of callsign. The callsign is only a unique identifier but the enforcement should cover the person not just the licence.

If the disqualified person is a licence holder of a club callsign, the callsign itself should not be removed else that effectively disqualifies the club, not the person. So care should be taken to exclude only the person, not the club callsign.

**Question 4: Do you agree that the word 'automatically' should be removed from Clause 4(5) of the Licence, in relation to the revocation of the Licence for failure to comply with the revalidation requirements?:**

No Enforcement action is still required. "Automatic" revocation has no effect if the offender continues to operate regardless of the revocation. Ofcom still needs to be the enforcer, not some magic word that has no effect in the absence of effective enforcement.

If the disqualified person is a licence holder of a club callsign, the callsign itself should not be removed else that effectively disqualifies the club, not the person. So care should be taken to exclude only the person, not the club callsign. "Automatic" revocation has a tendency to include too broad a scope, including club callsigns. this is undesirable.

**Question 5: Do you agree that Clause 15 of the Licence should be updated to reflect the wording included in Ofcom's General Licence Conditions Booklet?:**

Yes

**Question 6: Do you agree that Clause 13 of the Licence should be amended to allow for a simpler, more flexible approach for identifying Amateur Radio stations?:**

No. It will have no on-air effect on operation. This proposal is purely a cosmetic change to the documentation, and benefits no-one.

**Question 7: Given the current uncertainty amongst Radio Amateur licensees in relation to Clause 2(2), do you believe that it would be a practical solution for Ofcom to remove this Clause and to insert additional wording into Clause 13, as proposed above?:**

There is no uncertainty. You are mistaken. Leave this as is. International country recognition, awards programmes and operations are based strategically on the current system. There is no need to change this.

To change it would cause much unnecessary and avoidable confusion on a global level, and all stations in the UK become a single country, where they are currently 7 distinct and desirable separate countries in amateur radio.

in the strongest possible terms, please do not change this.

**Question 8: Do you agree with Ofcom's proposal to amend Clause 2(3) of the Licence to require Intermediate licensees to transmit a call sign that reflects the location of their main station?:**

In practice this is the case already. For example, a user G3AAA in Scotland uses GM3AAA when in Scotland, regardless of what the issue was printed as.

Similarly, if a licensee is issued 2E1AAA and goes to Scotland they already sign 2M1AAA regardless of what the paperwork says.

There is no need to review the paperwork as amateur radio training takes care of this Ofcom-only anomaly.

many stations granted paperwork in England and then who have relocated to Scotland, or vice versa, have inconsistent paperwork.

Ofcom need not action this as on-air operation takes care of it.

This is a futile bureaucratic issue only, which would require new licences to be issued whenever the user relocates on a permanent basis, and is therefore not necessary. It only causes more work for Ofcom, not less.

leave this as is. On air operation already takes care of this anomaly. No further work is required to correct a non-existent issue.

**Question 9: Do you agree that replacing Clauses 2(1) and 16(1) with a new Clause to simplify and bring together all of the licence conditions relating to the operation of radio equipment away from the Main Station address will make these provisions clearer?:**

Yes I agree.

However, I would further add that a licensee using remote transmitter equipment overseas must ensure they are licenced in the country of the transmitter location, and/or be operating under a CEPT agreement within that country. For example, a UK licensee operating a transmitter in, for example, Poland, must use SP/{home callsign} since they are transmitting from another country.

Alternatively, transmitting from another country's transmitter should be prohibited as the licensee is not physically present in the country of the transmitter and so is not in full control of the transmitter station.

In either case, the licensee is not acting responsibly as they are unable to control the station should there be an RFI/TVI issue or electrical issue.

Remote operation within the UK should continue to be permitted, subject to the regional prefix being used based on the location of the transmitter, not the operator.

**Question 10: Do you agree that the proposed changes will clarify RAYNET operation under the Licence?:**

I agree